



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Monterey Bay National Marine Sanctuary
299 Foam Street
Monterey, California 93940

May 30, 2001

Paul Reilly
California Department of Fish and Game
20 Lower Ragsdale Drive, Suite 100
Monterey, CA 93940

Dear Mr. Reilly:

Thank you for the opportunity to comment on the general goals and approach to the development of a Master Plan to improve the array of marine protected areas in state waters as required by the Marine Life Protection Act (MLPA). The Monterey Bay National Marine Sanctuary, a Federal marine protected area, was established to enhance and protect the ecosystem, habitats, natural and cultural resources on the central California coast through resource management, research and education. The Sanctuary is also mandated to promote public and private uses of the Sanctuary that are compatible with the primary goal of resource protection. The Sanctuary's overarching mandates are clearly compatible with the goals of the MLPA.

The Sanctuary recognizes the inherent value of the region's commercial and recreational fishing fleets as key elements of the region's history, culture and economy. The diverse and productive fisheries of central California reflect the diverse and productive ecosystem protected by the Sanctuary. These same fisheries and the long-term health of the marine ecosystem were a major impetus in designating the Sanctuary in 1992. Building and maintaining sustainable fisheries is a key objective the Sanctuary shares with other agencies, local communities, and most importantly, users like fishermen.

Recently fishing representatives from throughout the Sanctuary region organized themselves into the Alliance of Communities for Sustainable Fisheries (Alliance) in order to provide input to the Sanctuary and other agencies on fishery issues. Sanctuary staff applauds the vision and leadership of the Alliance, and supports their efforts to have a dialogue in partnership on fisheries issues. Similarly, the Sanctuary Advisory Council has supported a collaborative regional approach in working with the Alliance on fisheries and reserve issues, including the involvement of research and environmental group representatives.

The Sanctuary has recently begun work with an Alliance study group to evaluate the feasibility and impacts of marine reserves within the Sanctuary region. Although the group has just initiated its efforts, it should provide valuable local input to the MLPA process as it evolves over the coming year. The Sanctuary



recommends that CDFG work cooperatively with this group and other stakeholders to evaluate the biological and socioeconomic issues related to marine reserves. The MLPA process should allow adequate time for this group and other stakeholders to thoroughly investigate and comment on the reserve issue before state recommendations are finalized.

We offer the Sanctuary's assistance to CDFG in engaging various stakeholders in a collaborative approach to reserves which would go beyond the level of discussion and interaction possible in public hearings. Multi-stakeholder efforts have been characteristic of the Monterey Bay National Marine Sanctuary's past approaches in dealing with contentious issues, including water quality issues such as agriculture, offshore commercial vessel traffic, and kelp harvesting. Our work with the Fisheries Alliance, the Sanctuary Advisory Council and its research panel and conservation working group could be of assistance to CDFG in obtaining additional review and input to the MLPA process. Some of the tools used in the Channel Islands Marine Reserves Working Group process may also be adaptable to the state's needs.

As science should play a key role in any reserve process, the Sanctuary recommends that any new plan developed through the MLPA implementation include provisions to strengthen research on existing reserves in California to gather data on their short and long-term effects both inside and outside of their boundaries. Such research should address impacts on both targeted and nontargeted species. Additionally, a program to monitor effectiveness and compliance should also be developed and fully implemented for any additional reserves which are proposed, and provisions included for adaptive management based on long-term monitoring results.

The MLPA legislation states the location of marine reserves must be allocated by bioregions. The scientific literature, as well as the original legislation, indicates overwhelmingly that there are three bioregions along the California coast, not four, and that Ano Nuevo is not a biogeographic break point. Our discussion with CDFG staff and members of the MLPA Science Committee has clarified that the Ano Nuevo line was selected based on dividing the coast into roughly four regions of equal size, and not because it is a biogeographic break. We support the four region concept if it is clearly stated that these are not marine bioregions.

We support the State of California taking a lead to propose and adopt marine reserves in state waters, including those within the Monterey Bay National Marine Sanctuary. We believe any plan for marine reserves adopted through the MLPA process needs to address linkages to habitats and populations beyond state waters, as most marine species are highly mobile, as are fishermen—a boundary for a marine reserve at state waters may be an artificial one to marine species and humans who rely on these species.

The Sanctuary anticipates providing more detailed comments on the MLPA Master Plan after the state's draft is released and the joint evaluation with the

Alliance study group on reserves has progressed. If you need additional information, please contact Holly Price of my staff at (831) 647-4247.

Sincerely,

A handwritten signature in black ink that reads "William J. Douros". The signature is written in a cursive style with a large, stylized "W" and "D".

William J. Douros
Superintendent

cc:

Stephanie Harlan, SAC Chair
Mike Ricketts, Alliance Chair